

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

CASE NO. 14-08561 MCF

CARMELO CAEZ CRUZ

AMARILYS COLON FERNANDEZ

Debtors

CHAPTER 13

MOTION REQUESTING ENTRY OF ORDER

TO THE HONORABLE COURT:

NOW COME debtors herein, CARMELO CAEZ RUIZ and AMARILYS COLON FERNANDEZ, by their undersigned attorney, and very respectfully ALLEGE AND PRAY:

1. On September 23rd, 2015, debtors herein filed an Objection to Claim #8 filed by Department of Treasury . (Docket # 51)
2. The same was notified to said creditor on September 23rd, 2015. (Docket # 52)
3. On October 22nd, 2015, creditor Department of Treasury filed a Motion Requesting Extension of Time of thirty (30) days to reply to debtors' objection to claim. (Docket # 56)
4. More than thirty (30) days has elapsed since the filing of the Objection to Claim #8, and since the filing of creditor's Motion Requesting Extension of Time.
5. Until this date, no additional extension of time or reply to debtors' objection to claim has been filed by the creditor.
6. The present case has a confirmation hearing scheduled for January 21st, 2016, and this is the only pending matter in order to confirmed debtors payment plan.
7. Due to the above informed, it is respectfully requested that this Honorable Court enter an order granting debtors' Objection to Claim #8.

WHEREFORE debtors herein respectfully request that the Honorable Court takes notice of the above informed and enter an order granting debtors Objection to Claim #8 since more than thirty (30) days has elapsed and no additional extension of time or reply has been filed by creditor Department of Treasury, and that all other remedies which are proper and just be granted.

Certificate of Service

I HEREBY CERTIFY on this same date I electronically filed the foregoing document with the clerk of the court using the CM/ECF System which will sent notification of such filing to the following: Chapter 13 Trustee, US Trustee and to all creditors registered to said system. On this same date, I have sent copy of said document by regular mail to all parties in interest that are non CM/ECF participants as of the creditor matrix attached hereto.

In San Juan, Puerto Rico, this 13th day of January, 2016.

By: */s/ Juan C. Bigas Valedón*
JUAN C. BIGAS VALEDON
Attorneys for Debtor
U.S.D.C. NO. 215404
P.O. Box 7011
Ponce, P.R. 00732-7011
Tel. 259-1000; Fax 842-4090
jcbigas@yahoo.com

Label Matrix for local noticing
0104-3

Case 14-08561-MCF13

District of Puerto Rico
Old San Juan

Wed Jan 13 13:48:06 AST 2016

TREASURY DEPARTMENT

C/O DORIS E HERNANDEZ DIAZ, ESQ.

DEPARTMENT OF JUSTICE

PO BOX 9020192

SAN JUAN, PR 00902-0192

BAYVIEW LOAN SERVICING, LLC

PO BOX 11750

FERNANDEZ JUNCOS STATION

SAN JUAN, PR 00910-2850

RELIABLE FINANCIAL SERVICES

PO BOX 21382

SAN JUAN, PR 00928-1382

US Bankruptcy Court District of P.R.

Jose V Toledo Fed Bldg & US Courthouse

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

ABE

PO BOX 364267

SAN JUAN, PR 00936-4267

AMARILYS COLON FERNANDEZ

URB BAIROA GOLDEN GATES

CALLE C-11

CAGUAS, PR 00727

BAYVIEW LOAN SERVICING

4425 PONCE DE LEON 5TH FL

CORAL GABLES, FL 33146-1837

CARMELO CAEZ CRUZ

URB BAIROA GOLDEN GATES

CALLE C-11

CAGUAS, PR 00727

CRIM

PO BOX 195387 SAN JUAN PR 00919-5387

Department of Treasury

Bankruptcy Section (424)

P.O. Box 9024140

San Juan PR 00902-4140

ECMC

PO BOX 16408

St. Paul, MN 55116-0408

JUAN C BIGAS

PO BOX 7011

PONCE PR 00732-7011

NCO FINANCIAL SYSTEMS OF PR

PO BOX 15520

WILMINGTON, DE 19850-5520

(p) SPRINT NEXTEL CORRESPONDENCE

ATTN BANKRUPTCY DEPT

PO BOX 7949

OVERLAND PARK KS 66207-0949

U.S. Department of Education

PO Box 16448

St. Paul, MN 55116-0448

ALEJANDRO OLIVERAS RIVERA

ALEJANDRO OLIVERAS CHAPTER 13 TRUS

PO BOX 9024062

SAN JUAN, PR 00902-4062

JUAN CARLOS BIGAS VALEDON

JUAN C BIGAS LAW OFFICE

PO BOX 7011

PONCE, PR 00732-7011

MONSITA LECAROS ARIBAS

OFFICE OF THE US TRUSTEE (UST)

OCHOA BUILDING

500 TANCA STREET SUITE 301

SAN JUAN, PR 00901

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

(d) RELIABLE FINANCIAL SERVICES, INC.

P.O. BOX 21382

SAN JUAN, PR 00928-1382

Sprint Corp.

Attn Bankruptcy Dept

PO Box 7949

Overland Park KS 66207-0949

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)AMARILYS COLON FERNANDEZ
URB BAIROA GOLDEN GATES
CALLE C-11
CAGUAS, PR 00727

(d)CARMELO CAEZ CRUZ
URB BAIROA GOLDEN GATES
CALLE C-11
CAGUAS, PR 00727

End of Label Matrix	
Mailable recipients	18
Bypassed recipients	2
Total	20